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U.S. DISTRICT COURT
BAY CITY, MICHIGAN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

SENATE REPUBLICAN CAMPAIGN COMMITTEE,
KEN SIKKEMA FOR SENATE, FRED TAYLOR, a
registered voter, ROGER KAHN, FRIENDS OF ROGER
KAHN FOR SENATE, LAURA TOY, LAURA M. TOY
FOR STATE SENATE, JOHN PAPPAGEORGE,
FRIENDS OF JOHN PAPPAGEORGE FOR STATE
SENATE

Plaintiffs,

v

TERRI LYNN LAND, Secretary of State, in her official
capacity, SENATE DEMOCRATIC FUND, KEN
BROCK, SENATE DEMOCRATIC FUND
TREASURER, CARL WILLIAMS, CARL WILLIAMS
FOR SENATE, ALEXANDER LIPSEY, CITIZENS
FOR ALEXANDER LIPSEY, BOB SCHOCKMAN,
COMMITTEE TO ELECT BOB SCHOCKMAN,
GRETCHEN WHITMER, COMMITTEE TO ELECT
GRETCHEN WHITMER, MICHAEL SWITALSKI,
COMMITTEE TO ELECT MICHAEL SWITALSKI,
SAMUEL BUZZ THOMAS, COMMITTEE TO ELECT
SAMUEL BUZZ THOMAS, LIZ BRATER, FRIENDS
OF LIZ BRATER, MIKE PRUSI, FRIENDS OF MIKE
PRUSI, GILDA JACOBS, GILDA JACOBS FOR
SENATE, GLENN ANDERSON, GLENN ANDERSON
FOR STATE SENATE, MARK SCHAUER, MARK
SCHAUER FOR STATE SENATE, MARK SLAVENS,
MARK SLAVENS FOR SENATE, ANDY LEVIN,
AND FRIENDS OF ANDY LEVIN,

Defendants.

06 - 14925

Case Number:

Honorable:

JUDGE THOMAS L. LUDINGTON

MAGISTRATE JUDGE
CHARLES E. BINDER

**THIS IS A CHALLENGE TO
THE CONSTITUTIONALITY
OF A STATE LAW**

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COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiffs Senate Republican Campaign Committee, et al, aver as follows:

INTRODUCTION

The Michigan Campaign Finance Act establishes a clear limit on contributions from any persons, including Candidate Committees, to Political Party Caucus Committees. In blatant violation of that limit, Defendant Candidate Committees made at least twenty-five illegal contributions to the Senate Democratic Fund. Because of statutory restraints on administrative remedies for campaign finance related claims immediately preceding an election, this Court is the last line of defense to preventing the Defendants from using the illegal campaign contributions to influence the November 7, 2006, general election in violation of Plaintiffs' constitutional rights. Given the high stakes of this election that could determine majority control of the Michigan Senate, the Democratic Caucus's coordinated effort to transfer money to candidates in competitive senate races results in irreparable injury to Plaintiffs.

BASIS FOR FEDERAL JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. section 1331 because this case involves an interpretation of the United States Constitution and federal law.
2. Plaintiffs' action for declaratory and injunctive relief is authorized by 28 U.S.C. sections 2201(a) and 2202.
3. Venue is proper in this district pursuant to 28 U.S.C. section 1391(b) because all of the Defendants reside in Michigan and at least one Defendant resides in this district.
4. Venue is also proper in this district pursuant to 28 U.S.C. section 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this district.

THE PARTIES

5. Ken Sikkema for Senate contributed \$20,000, the maximum allowed contribution, to the Senate Republican Campaign Committee.
6. Fred Taylor is a registered voter who resides in Schoolcraft County and is an eligible voter in the 20th state senate district currently served by State Senator Tom George.
7. The Senate Republican Campaign Committee is a political party caucus committee under Mich. Comp. Laws §169.224a.
8. Friends of Roger Kahn for Senate is Roger Kahn's Candidate Committee.
9. Roger Kahn is a Candidate for Michigan Senate.
10. Laura M. Toy for State Senate is Laura Toy's Candidate Committee.
11. Laura M. Toy is a Candidate for Michigan Senate.
12. John Pappageorge is a Candidate for Michigan Senate.
13. Friends of John Pappageorge for State Senate is John Pappageorge's Candidate Committee.

14. Secretary of State Terri Lynn Land is the Michigan Secretary of State (the "Secretary") and is responsible for supervising and administering Michigan election and campaign finance laws. Mich. Comp. Laws §169.215.
15. Carl Williams for Senate is Carl Williams's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
16. Carl Williams is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
17. Citizens for Alexander Lipsey is Alexander Lipsey's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
18. Alexander Lipsey is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
19. Committee to Elect Bob Schockman is Bob Schockman's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
20. Bob Schockman is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
21. Committee to Elect Gretchen Whitmer is Gretchen Whitmer's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
22. Gretchen Whitmer is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
23. Committee to Elect Michael Switalski is a Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.

24. Michael Switalski is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
25. Committee to Elect Samuel Buzz Thomas is Samuel Buzz Thomas's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
26. Samuel Buzz Thomas is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
27. Friends of Liz Brater is Liz Brater's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
28. Liz Brater is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
29. Friends of Mike Prusi is Mike Prusi's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
30. Mike Prusi is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
31. Gilda Jacobs for Senate is Gilda Jacob's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
32. Gilda Jacobs is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
33. Glenn Andersen for Senate is Glenn Andersen's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
34. Glenn Andersen is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.

35. Mark Schauer for Senate is Mark Schauer's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
36. Mark Schauer is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
37. Mark Slavens for Senate is Mark Slavens's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
38. Mark Slavens is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
39. Friends of Andy Levin is Andy Levin's Candidate Committee which made illegal campaign contributions. Mich. Comp. Laws §§169.203(2), 169.252a.
40. Andy Levin is a Candidate for the Michigan Senate whose candidate committee made illegal campaign contributions. Mich. Comp. Laws §§169.203(1) and (2), 169.252a.
41. The Senate Democratic Fund is the Political Party Caucus Committee that accepted illegal campaign contributions from Carl Williams, Alexander Lipsey, Bob Schockman, Gretchen Whitmer, Michael Switalski, Buzz Thomas, Liz Brater, Mike Prusi, Gilda Jacobs, Glenn Anderson, Mark Schauer, and Mark Slavens. Mich. Comp. Laws §§169.224a, 169.252a.
42. Defendants Senate Democratic Fund, along with Carl Williams, Alexander Lipsey, Bob Schockman, Gretchen Whitmer, Michael Switalski, Buzz Thomas, Liz Brater, Mike Prusi, Gilda Jacobs, Glenn Anderson, Mark Schauer, and Mark Slavens and their respective candidate committees are collectively referred to herein as the "Democratic Caucus."

AVERMENTS COMMON TO ALL CLAIMS FOR RELIEF

Constitutional and Statutory Considerations

43. The First Amendment to the United States Constitution states:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

44. The Due Process and Equal Protection Clause of the Fourteenth Amendment to the United States Constitution states:

No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws. US Const., Amendment XIV.

45. The Michigan Campaign Finance Act, 1976 PA 388, Mich. Comp. Laws §169.201 to Mich. Comp. Laws §169.282 (the "Act"), prohibits a "person" from making contributions in excess of \$20,000 per calendar year to a senate political party caucus committee. Mich. Comp. Laws §169.252a(1).

46. The Act defines a "Person" as:

a business, individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, labor organization, company, corporation, association, committee, or any other organization or group of persons acting jointly. Mich. Comp. Laws §169.211(1) (Emphasis added).

47. The Act defines "Committee" as:

a person who receives contributions or makes expenditures for the purpose of influencing or attempting to influence the action of the voters for or against the nomination or election of a candidate, or the qualification, passage, or defeat of a

ballot question, if contributions received total \$500.00 or more in a calendar year or expenditures made total \$500.00 or more in a calendar year. **An individual, other than a candidate, does not constitute a committee.** A person, other than a committee registered under this act, making an expenditure to a ballot question committee shall for that reason not be considered a committee for the purposes of this act unless the person solicits or receives contributions for the purpose of making an expenditure to that ballot question committee. Mich. Comp. Laws §169.203(4) (emphasis added).

48. The Act defines "Candidate Committee" as:

[T]he committee designated in a candidate's filed statement of organization as that individual's candidate committee. A candidate committee shall be under the control and direction of the candidate named in the same statement of organization. Notwithstanding subsection (4), an individual shall form a candidate committee pursuant to section 21 when the individual becomes a candidate under subsection (1). Mich. Comp. Laws §169.203(2) (Emphasis added).

49. Under the Act, a Candidate Committee is a "Person" that is prohibited from making contributions in excess of \$20,000 per calendar year to a senate political party caucus committee.

50. The Act prohibits Defendant Candidate Committees from making contributions in excess of \$20,000 per calendar year to a senate political party caucus committee, such as the Senate Democratic Fund.

51. The Act prohibits the Senate Democratic Fund and its treasurer from accepting contributions in excess of \$20,000 in a calendar year from a single candidate committee. Mich. Comp. Laws §169.252a(1).

The Illegal Contributions

52. Carl Williams for Senate made two illegal contributions, totaling \$15,000 in illegal contributions (See Exhibit 1).

A. On September 29, 2006, Carl Williams for Senate exceeded the statutory limit by contributing \$25,000.

B. On October 20, 2006, Carl Williams for Senate again exceeded the statutory limit by contributing an additional \$10,000.

53. Citizens for Alexander Lipsey made two illegal contributions, totaling \$30,000 in illegal contributions (See Exhibit 2).

A. On August 30, 2006, Citizens for Alexander Lipsey exceeded the statutory limit by contributing \$25,000.

B. On September 25, 2006, Citizens for Alexander Lipsey again exceeded the statutory limit by contributing an additional \$25,000.

54. Committee to Elect Bob Schockman made one illegal contribution, totaling \$5,000 in illegal contributions (See Exhibit 3).

A. On October 7, 2006, the Committee to Elect Bob Schockman exceeded the statutory limit by contributing \$25,000.

55. Committee to Elect Gretchen Whitmer made two illegal contributions, totaling \$16,500 in illegal contributions (See Exhibit 4).

A. Between April 20, 2006, and July 20, 2006, the Committee to Elect Gretchen Whitmer contributed \$16,500.

B. On October 10, 2006, the Committee to Elect Gretchen Whitmer exceeded the statutory limit by contributing an additional \$15,000.

C. On October 23, 2006, the Committee to Elect Gretchen Whitmer exceeded the statutory limit by contributing an additional \$5,000.

56. Committee to Elect Michael Switalski made two illegal contributions, totaling \$50,000 in illegal contributions (See Exhibit 5).

- A. On August 30, 2006, the Committee to Elect Michael Switalski contributed \$10,000.
- B. On October 11, 2006, the Committee to Elect Michael Switalski exceeded the statutory limit by contributing an additional \$30,000.
- C. On October 26, 2006, the Committee to Elect Michael Switalski exceeded the statutory limit by contributing an additional \$30,000.

57. Committee to Elect Samuel Buzz Thomas made three illegal contributions, totaling \$18,000 in illegal contributions (See Exhibit 6).

- A. Between March 15, 2006, and July 19, 2006, the Committee to Elect Samuel Buzz Thomas contributed \$15,500.
- B. On September 19, 2006, the Committee to Elect Samuel Buzz Thomas exceeded the statutory limit by contributing an additional \$5,000.
- C. On October 1, 2006, the Committee to Elect Samuel Buzz Thomas again exceeded the statutory limit by contributing an additional \$2,500.
- D. On October 11, 2006, the Committee to Elect Samuel Buzz Thomas again exceeded the statutory limit by contributing an additional \$15,000.

58. Friends of Liz Brater made one illegal contribution, totaling \$13,000 in illegal contributions (See Exhibit 7).

- A. Between April 20, 2006, and September 1, 2006, Friends of Liz Brater contributed \$13,000.

- B. On October 11, 2006, Friends of Liz Brater exceeded the statutory limit by contributing an additional \$20,000.

59. Friends of Mike Prusi made one illegal contribution, totaling \$5,000 in illegal contributions (See Exhibit 8).

- A. Between March 15, 2006, and September 5, 2006, Friends of Mike Prusi contributed \$10,000.
- B. On October 10, 2006, Friends of Mike Prusi exceeded the statutory limit by contributing an additional \$15,000.

60. Gilda Jacobs for Senate made three illegal contributions, totaling \$30,500 in illegal contributions (See Exhibit 9).

- A. Between May 17, 2006, and June 20, 2006, Gilda Jacobs for Senate Committee contributed \$20,000.
- B. On September 20, 2006, Gilda Jacobs for Senate Committee exceeded the statutory limit by contributing an additional \$10,500.
- C. On September 20, 2006, Gilda Jacobs for Senate Committee again exceeded the statutory limit by contributing an additional \$15,000.
- D. On October 20, 2006, Gilda Jacobs for Senate Committee again exceeded the statutory limit by contributing an additional \$5,000.
- E. On October 27, 2006, Gilda Jacobs for Senate Committee again exceeded the statutory limit by contributing an additional \$5,000.

61. Glenn Anderson for State Senate made one illegal contribution, totaling \$30,000 in illegal contributions (See Exhibit 10).

- A. On September 7, 2006, Glenn Anderson for State Senate exceeded the statutory limit by contributing \$50,000.

62. Mark Schauer for State Senate made six illegal contributions, totaling \$202,250 in illegal contributions (See Exhibit 11).

- A. Between April 20, 2006, and May 17, 2006, Mark Schauer for State Senate contributed \$12,250.
- B. On July 15, 2006, Mark Schauer for State Senate exceeded the statutory limit by contributing \$15,000.
- C. On August 29, 2006, Mark Schauer for State Senate again exceeded the statutory limit by contributing an additional \$25,000.
- D. On September 19, 2006, Mark Schauer for State Senate again exceeded the statutory limit by contributing an additional \$60,000.
- E. On October 10, 2006, Mark Schauer for State Senate again exceeded the statutory limit by contributing an additional \$75,000.
- F. On October 19, 2006, Mark Schauer for State Senate again exceeded the statutory limit by contributing an additional \$20,000.
- G. On October 26, 2006, Mark Schauer for State Senate again exceeded the statutory limit by contributing an additional \$15,000.

63. Mark Slavens for Senate made one illegal contribution, totaling \$20,000 in illegal contributions (See Exhibit 12).

- A. Between September 15, 2006, and September 29, 2006, the Mark Slavens for Senate Committee contributed \$20,000.

- B. On October 6, 2006, the Mark Slavens for Senate Committee exceeded the statutory limit by contributing \$20,000.

The Scheme to Transfer Illegal Contributions

64. The Democratic Caucus has conspired to illegally transfer at least \$440,250 from the Defendant Committees to the Senate Democratic Fund.
65. On September 28, 2006, the Senate Democratic Fund transferred \$31,322.50 to Defendant Anderson's Candidate Committee. (See Exhibit 13.)
66. On October 19, 2006, the Senate Democratic Fund transferred \$150,000.00 to Defendant Levin's Candidate Committee. (See Exhibit 14.)
67. On October 5, 2006, the Senate Democratic Fund transferred \$155,782.00 to Defendant Lipsey's Candidate Committee. (See Exhibit 15.)
68. On October 12, 2006, the Senate Democratic Fund transferred \$95,000.00 to Defendant Lipsey's Candidate Committee. (See Exhibit 16.)
69. On October 19, 2006, the Senate Democratic Fund transferred \$125,000.00 to Defendant Lipsey's Candidate Committee. (See Exhibit 17.)
70. On September 28, 2006, the Senate Democratic Fund transferred \$92,451.50 to Defendant Williams' Candidate Committee. (See Exhibit 18.)
71. On October 5, 2006, the Senate Democratic Fund transferred \$72,671.00 to Defendant Williams' Candidate Committee. (See Exhibit 19.)
72. On October 12, 2006, the Senate Democratic Fund transferred \$90,400.00 to Defendant Williams' Candidate Committee. (See Exhibit 20.)

73. On October 19, 2006, the Senate Democratic Fund transferred \$84,000.00 to Defendant Williams' Candidate Committee. (See Exhibit 21.)
74. The total amount that the Senate Democratic Fund shifted to candidates in competitive races is at least \$927,627.00, including at least \$440,250 in illegal campaign contributions.
75. Upon information and belief, the Senate Democratic Fund will continue to spend that illegally obtained \$440,250 to fund campaign efforts for Democratic Senatorial candidates in the November 7, 2006, general election.

No Meaningful Remedy

76. On October 26, 2006, Plaintiffs contacted the Secretary and the Attorney General to request that those agencies prosecute the Democratic Caucus's illegal contributions.
77. On October 30, 2006, Plaintiff Sikkema filed a Complaint with the Secretary. (See Exhibit 22.)
78. The Secretary is Michigan's chief election officer and is charged with ensuring compliance with the Act. Mich. Comp. Laws §169.215.
79. The Act states that:

If the secretary of state determines that there may be reason to believe that a violation of this act has occurred, the secretary of state shall endeavor to correct the violation or prevent a further violation. Mich. Comp. Laws §169.215(10).

80. The Act limits, however, the Secretary's ability to investigate and prosecute violations of the Act within 30 days of an election, stating that:

The secretary of state may commence a hearing to determine whether a civil violation of this act has occurred. A hearing shall not be commenced during the period beginning 30 days before an election in which the committee has received or expended money and ending the day after that election except with the consent

of the person suspected of committing a civil violation. Mich. Comp. Laws §169.215(11).

81. Plaintiffs have requested that the Attorney General and a local prosecutor with appropriate jurisdiction prosecute the Democratic Caucus's illegal contributions.

82. Given the unique nature of this matter, neither the Attorney General nor any local prosecutor are able to grant meaningful relief before the November 7, 2006, general election.

83. The Democratic Caucus is using the illegal campaign contributions to transfer funds from candidates in non-competitive races to candidates in competitive races.

84. The Act prohibits a person from transferring contributions to a candidate committee, stating:

A contribution shall not be made by a person to another person with the agreement or arrangement that the person receiving the contribution will then transfer that contribution to a particular candidate committee. Mich. Comp. Laws §169.244(1)

85. The Act also limits the amount one candidate committee can contribute to another candidate committee, stating that:

A candidate committee shall not make a contribution to or an independent expenditure on behalf of another candidate committee. This subsection does not prohibit the purchase of tickets to another candidate committee's fund-raising event that does not exceed \$100.00 per candidate committee in any calendar year. Mich. Comp. Laws §169.244(2).

86. Based on the Act's limits on candidate committees contributing to other candidate committees, absent the illegal transferring of those contributions, the Democratic candidates in non-competitive races would be limited to directly transferring only \$100 to those competitive races.

87. Instead, the Democratic Caucus is violating the Act in order to transfer at least \$440,250 in illegal contributions from non-competitive senate races to competitive senate races.

88. The Democratic Caucus has used and continues to use its illegal contributions to gain an unfair advantage in the November 7, 2006, general election.

89. Given the unique nature of the use of political expenditures for political speech during the election cycle, if the Democratic Caucus is not stopped before the election from making, accepting, or spending illegal campaign contributions, there will be no meaningful redress to the harm that the Plaintiffs have and will suffer.

FIRST CLAIM FOR RELIEF

(Request for Declaratory Judgment Under Declaratory Judgment Act)

90. Plaintiffs hereby reallege and reincorporate by reference the above paragraphs.

91. The Declaratory Judgment Act states:

In a case of actual controversy within its jurisdiction...upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought. Any such declaration shall have the force and effect of a final judgment or decree and shall be reviewable as such. 28 U.S.C. § 2201.

92. The Act limits at \$20,000 the amount that a candidate committee may contribute to a political party caucus committee. Mich. Comp. Laws §169.252a

93. The Democratic Caucus exceeded that limit by accepting at least 25 contributions totaling at least \$440,250 more than the statutory limit.

94. The Act allows the Secretary, the Attorney General, and local prosecutors to enforce the penalty provisions set forth therein.

95. Under the Act, making or accepting illegal contribution constitutes a misdemeanor. Mich. Comp. Laws §169.252a(2)

96. Under the Act, each excessive contribution made to a senate political party caucus committee subjects the persons making and receiving those contributions to 90 days imprisonment, and a \$1,000 fine if made by an individual, and a \$10,000 fine if made by a candidate committee. Mich. Comp. Laws §169.252a(2).
97. Restraints upon political contributions are restraints upon the rights to free speech, free association, and free expression under the First Amendment to the United States Constitution, but are legal and important to ensuring a level playing field provided all affected parties comply with those restraints and to prevent corruption or the appearance of corruption.
98. The contribution limits imposed by the Act are a prior restraint on Plaintiffs' actions because they had a chilling effect on contributions that Plaintiffs made and accepted.
99. Conversely, to the extent the Secretary is statutorily prevented from enforcing the Act's contribution limits vis-à-vis the Senate Democratic Fund's acceptance of illegal campaign contributions, Plaintiffs are denied equal protection under the laws of the State of Michigan in violation of the Fourteenth Amendment to the United States Constitution.
100. Because the Act provides for no mechanism for Plaintiffs to redress the harm caused by the Democratic Caucus's violation of the Act's harm, and because the Secretary, the Attorney General, and local prosecutors cannot provide any meaningful remedy, Plaintiffs will be denied equal protection under Michigan's laws to the extent the campaign contribution limits are enforced against the Plaintiffs but not against the Democratic Caucus.

101. The First Amendment to the United States Constitution, in pertinent part, states that “Congress shall make no law...abridging the right of the people...to petition the Government for a redress of grievances.”
102. The statutory prohibition against the Secretary investigating the Democratic Caucus’s actions amounts to an abrogation of Plaintiffs’ right to petition the Government for redress of the harm caused by the Democratic Caucus’s illegal campaign contributions, and therefore deprive Plaintiffs of equal protection of the laws of the State of Michigan.
103. Accordingly, the actual controversy in this case is that, absent a declaration by this Court, because neither the Secretary, Attorney General, or local prosecutors can provide meaningful relief against the Democratic Caucus, the Democratic Caucus will be allowed to continue to accept and expend illegal contributions for the November 7, 2006, election.
104. Because the Plaintiffs will continue to comply with Michigan law while having no opportunity to seek legal redress for the Democratic Caucus’s illegal contributions, Plaintiffs will be deprived of their equal protection under the laws of the State of Michigan.
105. To the extent Plaintiffs must comply with the Act, but the Secretary is statutorily barred from investigating the Democratic Caucus for violating the Act prior to the election, the Act’s bar against action by the state constitutes government action that deprives Plaintiffs’ equal protection and due process under the laws of Michigan.
106. WHEREFORE, Plaintiffs respectfully request that this Court enter an order and judgment declaring that:
- A. The Democratic Caucus has violated the Act by accepting contributions in excess of the contribution limits set forth therein.

B. The Secretary's statutory inability to investigate the Democratic Caucus for the egregious violations of the Act constitutes government action that deprives Plaintiffs' equal protection under the laws of Michigan.

SECOND CLAIM FOR RELIEF

(Injunctive Relief)

107. Plaintiffs hereby reallege and reincorporate by reference the above paragraphs.
108. The Act limits the amount of political contributions from candidate to political party caucus committees to \$20,000. Mich. Comp. Laws §169.252a
109. The Senate Democratic Fund accepted contributions from twelve candidate committees above the contribution limit, resulting in contributions of at least \$440,250 above the amount permitted by the Act.
110. Upon information and belief, the Senate Democratic Fund has spent and will continue to spend that illegally obtained \$440,250 to fund campaign efforts for Democratic Senatorial candidates in the November 7, 2006.
111. The Act states that:

If the secretary of state determines that there may be reason to believe that a violation of this act has occurred, the secretary of state shall endeavor to correct the violation or prevent a further violation. Mich. Comp. Laws §169.215(10).
112. The Act further states that:

The secretary of state may commence a hearing to determine whether a civil violation of this act has occurred. A hearing shall not be commenced during the period beginning 30 days before an election in which the committee has received or expended money and ending the day after that election except with the consent of the person suspected of committing a civil violation. Mich. Comp. Laws §169.215(11).

113. On October 30, 2006, Senate Majority Leader Ken Sikkema filed a Complaint against the Democratic Caucus with the Secretary.
114. The Secretary is statutorily barred from taking action in response to that Complaint before the November 7, 2006, general election.
115. The Secretary's statutory inability to enforce the Act's contribution limits before the election results in irreparable injury because, although the Senate Democratic Fund will be permitted to use those illegal contributions to fund democratic senate candidates, Plaintiffs and other Republican senate candidates' spending (i.e., speech) will be limited because Plaintiffs followed the law.
116. Conversely, the Secretary would not be harmed by enforcing the Act's requirements to the Democratic Caucus because the Democratic Caucus would only be limited to making contributions in compliance with the Act.
117. Similarly, the Democratic Caucus will not be harmed if this Court requires the Democratic Caucus to comply with the Act.
118. Given the nature of Plaintiffs' injury, there is no adequate remedy available at law because the election will be over and the Democratic Caucus's money will be spent before any administrative action or action at law could be resolved.
119. Plaintiffs are entitled to an injunction precluding the Secretary from not investigating the Democratic Caucus's illegal campaign finance contributions.
120. Plaintiffs are entitled to an injunction precluding the Senate Democratic Fund from expending the \$440,250 in illegal campaign finance contributions obtained by the Senate Democratic Fund.

121. Plaintiffs are entitled to an injunction precluding the Defendant Candidates from making, and Defendant Senate Democratic Fund from accepting or expending, further illegal campaign contributions in violation of the Act .
122. WHEREFORE, Plaintiffs respectfully request that this Court permanently enjoin:
- A. the Secretary from not immediately investigating the Democratic Caucus's illegal campaign finance contributions;
 - B. the Democratic Caucus from expending the \$440,250 in illegal campaign finance contributions obtained by the Democratic Caucus;
 - C. the Democratic Caucus from accepting further illegal campaign contributions in violation of the Act.

THIRD CLAIM FOR RELIEF

(Request for Relief Under 42 U.S.C. 1983)

123. Plaintiffs hereby reallege and reincorporate by reference the above paragraphs.
124. The First and Fourteenth Amendments of the United States Constitution protect freedom of speech, association and expression.
125. As detailed above, the Secretary's statutory inability to investigate the Democratic Caucus's illegal contributions imposes a severe burden on Plaintiffs because Plaintiffs are bound to comply with Michigan law while the Democratic Caucus runs roughshod over Michigan's campaign contribution limits.
126. 42 U.S.C. § 1983 states that:
- Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the

jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. 42 U.S.C. 1983.

127. Section 1983 was intended not only to override discriminatory or otherwise unconstitutional state laws, and to provide a remedy for violations of civil rights where state law was inadequate, but also to provide a federal remedy where the state remedy, though adequate in theory, is not available in practice.
128. Although an adequate remedy exists in theory, Plaintiffs' remedy for the Act's violation of its civil rights is not available in practice because the Secretary, the Attorney General, and local prosecutors cannot provide a meaningful remedy before the November 7, 2006, election.
129. By reason of the foregoing, Defendant Secretary, acting under color of state law as required by the Act, has deprived and will continue to deprive Plaintiffs of the rights, privileges, and immunities secured to them by the First and Fourteenth Amendments to the United States Constitution and protected under 42 U.S.C. § 1983.
130. Plaintiffs and their members have no adequate remedy at law for such deprivation of their rights, privileges, and immunities.
131. Defendants have no compelling or important interest that justifies this severe and unequal burden upon Plaintiffs' right to participate in the political right or their fundamental right to free speech, free expression, and free association.

132. WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' costs and attorney fees under 42 U.S.C. § 1988.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter one or more orders and judgments granting the following relief:

- A. Enter a temporary restraining order and preliminary injunction and, after a final hearing, a permanent injunction, enjoining:
 - i. the Secretary from not investigating the Democratic Caucus's illegal campaign finance contributions;
 - ii. the Democratic Caucus from expending the \$440,250 in illegal campaign finance contributions obtained by the Democratic Caucus;
 - iii. the Democratic Caucus from accepting or expending further illegal campaign contributions in violation of the Act.
- B. Enter a declaratory judgment that:
 - i. The Senate Democratic Fund has violated the Act by accepting contributions, and the Defendant Candidate Committees have violated the Act by making contributions, in excess of the contribution limits set forth therein;
 - ii. The prohibition in Mich. Comp. Laws §169.215(11) against the Secretary investigating violations of the Act within 30 days of an election violates the United States Constitution;
 - iii. The abrogation of a private right of action in Mich. Comp. Laws §169.215(16) violates the United States Constitution;

- iv. Plaintiffs may bring a private right of action to enjoin the Democratic Caucus's acceptance of illegal campaign contributions.
- C. Grant Plaintiffs' costs and attorney fees under 42 U.S.C. § 1988.
- D. Any other relief that the Court deems just and proper.

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: 

Gary P. Gordon (P26290)

W. Alan Wilk (P54059)

Jason T. Hanselman (P61813)

Attorneys for Plaintiffs

Dykema Gossett PLLC

Capitol View

201 Townsend Street, Suite 900

Lansing, MI 48933

(517) 374-9100

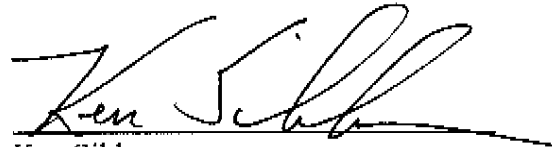
Date: October 31, 2006

VERIFICATION

I hereby verify that the factual contents of this Verified Complaint are based on my knowledge and investigation, and are true to the best of my knowledge.

10-31-06

Dated



Ken Sikkema

LAN01\163876.1
ID\JTHA

1



MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

278013

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-02. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 1341 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES Name: MI DISTRICT JUDGES EDUCATIONAL FUND 32437 FIVE MILE RD Address: LIVONIA MI 48154 4. Date of Receipt <u>09/26/2006</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 500.00 | 1500.00 |
| 3. Contribution # 1342 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES Name: Carl M. Williams for Senate Committee 3424 Fulton Street Address: Saginaw MI 48601-3116 4. Date of Receipt <u>09/29/2006</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 25000.00 | 25000.00 |
| 3. Contribution # 1343 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES Name: Mark Slavens for Senate PO Box 87906 Address: Canton MI 48187 4. Date of Receipt <u>09/29/2006</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 10000.00 | 20000.00 |
| 3. Contribution # 1344 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES Name: Committee To Elect Michael J. Carr 9307 Oadmont Apt 4 Address: Grand Blanc MI 48439 4. Date of Receipt <u>09/27/2006</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 250.00 | 250.00 |

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35750.00

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MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

278013

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

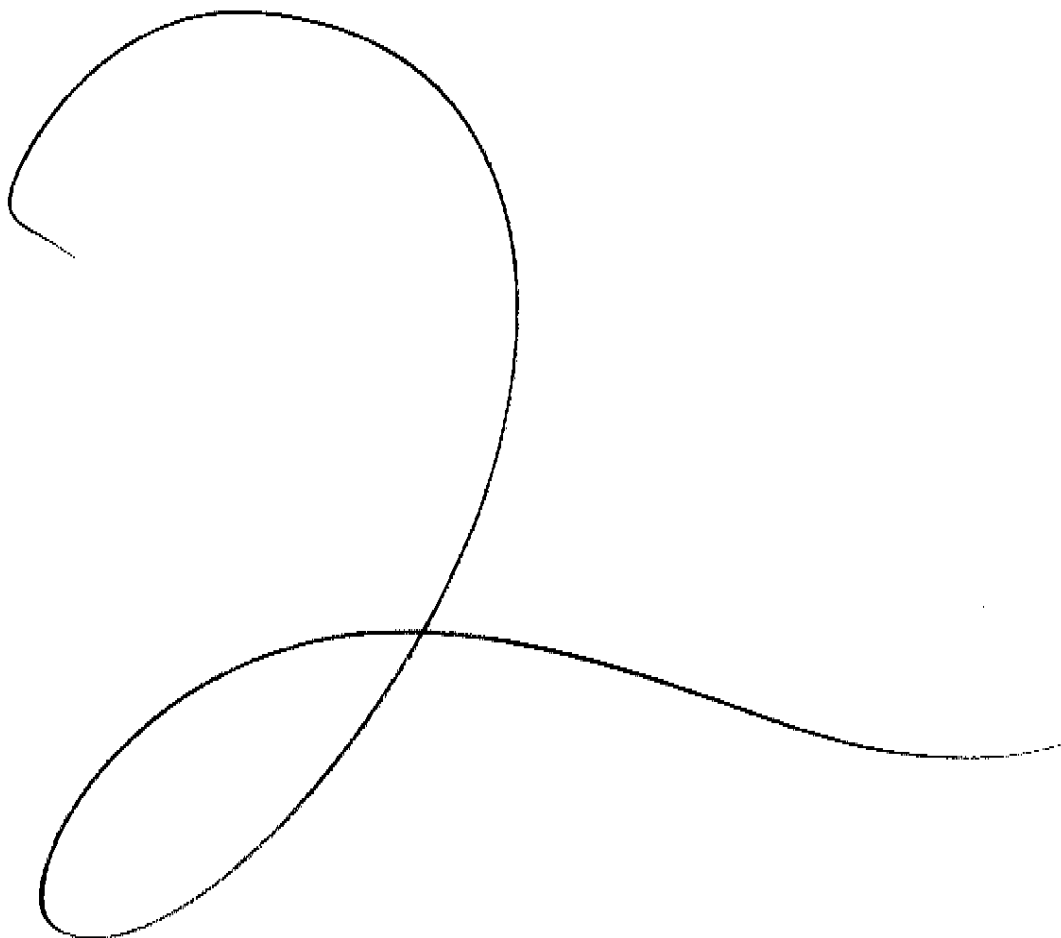
1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # 1281 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>10/03/2006</u> Name: <u>JAN CHRISTENSEN</u> <u>4178 WABANINGO</u> Address: <u>OKEMOS MI 48864</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 50.00 | 50.00 |
| 3. Contribution # 1282 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>10/13/2006</u> Name: <u>Robert Hannula</u> <u>701 County Road 480</u> Address: <u>Marquette MI 49855</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 10.00 | 10.00 |
| 3. Contribution # 1283 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>10/09/2006</u> Name: <u>MARGARET R BROWN</u> <u>316 N LIBERTY ST</u> Address: <u>MARSHALL MI 49068</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 25.00 | 25.00 |
| 3. Contribution # 1284 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/20/2006</u> Name: <u>Carl M. Williams for Senate Committee</u> <u>3424 Fulton Street</u> Address: <u>Saginaw MI 48601-3116</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 10000.00 | 35000.00 |

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Grand Total of All Schedules 2A
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10085.00

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A handwritten signature in black ink. The signature starts with a large, sweeping loop on the left side, then crosses itself to form a second, smaller loop below the first. The line then extends horizontally to the right, ending in a small, upward-curving flourish.



MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

278013

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-02. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # <u>865</u> Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>08/29/2006</u> Name: <u>WILLIAM DWIGHT</u> <u>3377 West Shore</u> Address: <u>Orchard Lake MI 48324</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>RETIRED</u> Employer <u>SELF-EMPLOYED</u> <u>3377 West Shore</u> Business Address <u>Orchard Lake MI 48324</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 500.00 | 500.00 |
| 3. Contribution # <u>866</u> Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>08/30/2006</u> Name: <u>Citizens for Alexander Lipsey</u> <u>PO Box 50803</u> Address: <u>Kalamazoo MI 49005</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 25000.00 | 25000.00 |
| 3. Contribution # <u>867</u> Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>08/18/2006</u> Name: <u>STEVEN SILK</u> <u>5757 W MAPLE SUITE 800</u> Address: <u>WEST BLOOMFIELD MI 48322</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>OWNER</u> Employer <u>VELMEIR</u> <u>5757 W. Maple Suite 800</u> Business Address <u>West Bloomfield MI 48322</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 250.00 | 250.00 |
| 3. Contribution # <u>868</u> Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>08/19/2006</u> Name: <u>RAYMOND ABRAMS</u> <u>33000 COVINGTON CLUB DR APT 38K</u> Address: <u>FARMINGTON MI 48334-1650</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>CEO</u> Employer <u>SNOOKERS POOL & PUB</u> <u>27630 Schoolcraft Road</u> Business Address <u>Livonia MI 48150</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 250.00 | 250.00 |

Page Subtotal
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26000.00

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Bureau of Elections

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**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 1073 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>09/25/2006</u> Name: Citizens for Alexander Lipsey PO Box 50803 Address: Kalamazoo MI 49005 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 25000.00 | 50000.00 |
| 3. Contribution # 1074 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>09/18/2006</u> Name: MARK BERTLER 652 FAIRWAY PARK DR Address: ANN ARBOR MI 48103 5. If over \$100.00 cumulative, please provide: Occupation <u>ASSOCIATE EXECUTIVE</u> Employer <u>MI ASSOCIATION FOR PUBLIC HEALT-</u> <u>H</u> PO Box 13276 Business Address <u>Lansing MI 48901</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 500.00 | 500.00 |
| 3. Contribution # 1075 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>09/27/2006</u> Name: ANN M BOVAN 5628 W WEIR Address: OSCODA MI 48750 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 10.00 | 45.00 |
| 3. Contribution # 1076 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>09/27/2006</u> Name: RICKY CEGLOWSKI 1131 WALWOOD DR NE Address: GRAND RAPIDS MI 49505 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 50.00 | 50.00 |

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25560.00

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Bureau of Elections

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ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE1. Committee I.D. Number 503510-02. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # <u>1329</u> Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/02/2006</u> Name: <u>UNITED TRANSPORTATION UNION</u> <u>230 N SYCAMORE ST #C</u> Address: <u>LANSING MI 48933</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 2500.00 | 4500.00 |
| 3. Contribution # <u>1330</u> Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>10/04/2006</u> Name: <u>JAMES W BURDICK</u> <u>1760 S TELEGRAPH RD STE 300</u> Address: <u>BLOOMFIELD HILLS MI 48302</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>ATTORNEY</u> Employer <u>HERTZ SCHRAM SARETSKY PC</u> <u>1760 S TELEGRAPH RD STE 300</u> Business Address <u>WEST BLOOMFIELD MI</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 250.00 | 250.00 |
| 3. Contribution # <u>1331</u> Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/03/2006</u> Name: <u>United Food & Commercial Workers Intl.</u> <u>1775 K Street N.W.</u> Address: <u>Washington DC 20006-1598</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 20000.00 | 25000.00 |
| 3. Contribution # <u>1332</u> Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/07/2006</u> Name: <u>Committee To Elect Bob Schockman</u> <u>1393 Winding Way</u> Address: <u>Temperance MI 48182</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 25000.00 | 25000.00 |

 Page Subtotal
 Grand Total of All Schedules 2A
 (Complete on last page of Schedule)

47750.00

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MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

267501

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # 1233 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>04/20/2006</u> Name: <u>Mark Schauer for State Senate</u> <u>1795 Hamilton Road</u> Address: <u>Battle Creek MI 49017</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 10000.00 | 10000.00 |
| 3. Contribution # 1234 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>04/20/2006</u> Name: <u>NANCY BOHNET</u> <u>1423 GRAY ST</u> Address: <u>LANSING MI 48912</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>Senate Staff</u> Employer <u>Michigan Senate</u> <u>PO Box 30036</u> Business Address <u>Lansing MI 48912</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 500.00 | 500.00 |
| 3. Contribution # 1235 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>04/20/2006</u> Name: <u>Committee To Elect Gretchen Whitmer</u> <u>PO Box 11063</u> Address: <u>Lansing MI 48901</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 4500.00 | 4500.00 |
| 3. Contribution # 1236 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>04/13/2006</u> Name: <u>Ted Bolander</u> <u>8349 Hidden Creek Dr.</u> Address: <u>Flushing MI 48433</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 25.00 | 25.00 |

Page Subtotal
Grand Total of All Schedules 2A
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15025.00

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277713

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-02. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 1041 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt: <u>07/13/2006</u> Name: <u>Raymond E. Basham for Senate</u> <u>12406 Telegraph Road</u> Address: <u>Taylor MI 48180</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 5000.00 | 5000.00 |
| 3. Contribution # 1042 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt: <u>06/19/2006</u> Name: <u>Committee to Elect Gretchen Whitmer</u> <u>PO Box 11063</u> Address: <u>Lansing MI 48901</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 10000.00 | 14500.00 |
| 3. Contribution # 1043 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt: <u>07/07/2006</u> Name: <u>PHILIP OLSON</u> <u>8123 DAVISON RD</u> Address: <u>DAVISON MI 48423</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 50.00 | 50.00 |
| 3. Contribution # 1044 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt: <u>07/13/2006</u> Name: <u>PLUMBERS PIPEFITTERS LOC 333 PAC</u> <u>5405 S MARTIN LUTHER KING</u> Address: <u>LANSING MI 48911</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 5000.00 | 5000.00 |

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20050.00

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MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

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**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 1625 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>07/20/2006</u> Name: <u>Committee to Elect Gretchen Whitmer</u> <u>PO Box 11063</u> Address: <u>Lansing MI 48901</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 2000.00 | 16500.00 |
| 3. Contribution # 1626 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>07/20/2006</u> Name: <u>Friends of Jim Barcia</u> <u>PO Box 775</u> Address: <u>Bay City MI 48707</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 3000.00 | 4000.00 |
| <div style="text-align: right;"> Page Subtotal 5000.00 Grand Total of All Schedules 2A 399775.00 (Complete on last page of Schedule) </div> | | |

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MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

278013

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-02. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # 761 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>08/23/2006</u> Name: Danielle Pennington 2332 Fair Ln. Address: Burton MI 48509 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 25.00 | 50.00 |
| 3. Contribution # 762 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/10/2006</u> Name: Tupac A. Hunter for State Senate 24461 Pembroke Ave Address: Detroit MI 48219 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 1300.00 | 4300.00 |
| 3. Contribution # 763 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/10/2006</u> Name: Friends of Mike Prusi 75 North Shore Drive Address: Ishpeming MI 49849 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 15000.00 | 24200.00 |
| 3. Contribution # 764 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/10/2006</u> Name: Committee to Elect Gretchen Whitmer PO Box 11063 Address: Lansing MI 48901 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 15000.00 | 31500.00 |

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31325.00

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LATE CONTRIBUTION REPORT

1. Your Committee ID# 503510
 2. Your Committee Name SENATE DEMOCRATIC FUND
 3. Date of Transaction 10/23/2006
 (Only one Date per Session)

ITEMIZED CONTRIBUTIONS

Contribution #1

| | | | |
|---|-------------------|----------------------------------|-----------------|
| Contributors Last Name or Organization | First Name | Occupation | Employer |
| Whitmer Leadership Fund | | Employer/Business Address | |
| Contributors Address | | City | State |
| PO Box 11063 | State | | MI |
| City | MI | Zip Code | Amount |
| Lansing | | | 5,000.00 |
| Zip Code | | | |
| 48901 | | | |

Contribution #2

| | | | |
|---|-------------------|----------------------------------|-----------------|
| Contributors Last Name or Organization | First Name | Occupation | Employer |
| Committee To Elect Gretchen Whitmer | | Employer/Business Address | |
| Contributors Address | | City | State |
| PO Box 11063 | State | | MI |
| City | MI | Zip Code | Amount |
| Lansing | | | 5,000.00 |
| Zip Code | | | |
| 48901 | | | |

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MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

278013

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 877 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>08/16/2006</u> Name: <u>PHYLLIS GOOGASIAN</u> <u>3750 ORION RD</u> Address: <u>OAKLAND MI 48363</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>Lawyer</u> Employer <u>The Googasian Firm</u> <u>6895 Telegraph Road</u> Business Address <u>Bloomfield Hills MI 48301</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 1000.00 | 1000.00 |
| 3. Contribution # 878 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>08/15/2006</u> Name: <u>DENNIS BERNARD</u> <u>843 SUFFIELD</u> Address: <u>BIRMINGHAM MI 48009</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>EXECUTIVE</u> Employer <u>BERNARD FINANCIAL GROUP</u> <u>20700 Civic Center Drive Suite 510</u> Business Address <u>Southfield MI 48076</u> Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 1000.00 | 1000.00 |
| 3. Contribution # 879 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>08/14/2006</u> Name: <u>MICHIGAN LICENSED BEVERAGE ASSOCIATION</u> <u>920 N. FAIRVIEW</u> Address: <u>P.O. BOX 4067</u> <u>EAST LANSING MI 48826</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 3000.00 | 3000.00 |
| 3. Contribution # 880 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>08/30/2006</u> Name: <u>Committee To Elect Michael Switalski</u> <u>31412 Gay</u> Address: <u>Roseville MI 48066</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 10000.00 | 10000.00 |

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15000.00

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MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

278013

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 765 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/11/2006</u> Name: Committee To Elect Michael Switalski 31412 Gay Address: Roseville MI 48066 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 30000.00 | 40000.00 |
| 3. Contribution # 766 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/10/2006</u> Name: Friends of Jim Barcia PO Box 775 Address: Bay City MI 48707 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 5000.00 | 19000.00 |
| 3. Contribution # 767 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/11/2006</u> Name: Committee To Elect Samuel Buzz Thomas PO Box 14854 Address: Detroit MI 48214 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 15000.00 | 37500.00 |
| 3. Contribution # 768 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/11/2006</u> Name: Friends of Liz Brater PO Box 7955 Address: Ann Arbor MI 48107 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 20000.00 | 30000.00 |

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70000.00

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LATE CONTRIBUTION REPORT

1. Your Committee ID# 503510
 2. Your Committee Name SENATE DEMOCRATIC FUND
 3. Date of Transaction 10/26/2006
 (Only one Date per Session)

ITEMIZED CONTRIBUTIONS

Contribution # 1

| | | | |
|---|--------------------|---|----------------------------|
| Contributors Last Name or Organization CITIZENS FOR A BETTER GOVERNMENT | First Name | Occupation Employer/Business Address | Employer |
| Contributors Address PO BOX 4220 | | City | State MI |
| City EAST LANSING | State MI | Zip Code | Amount 20,000.00 |
| Zip Code 48823 | | | |

Contribution # 2

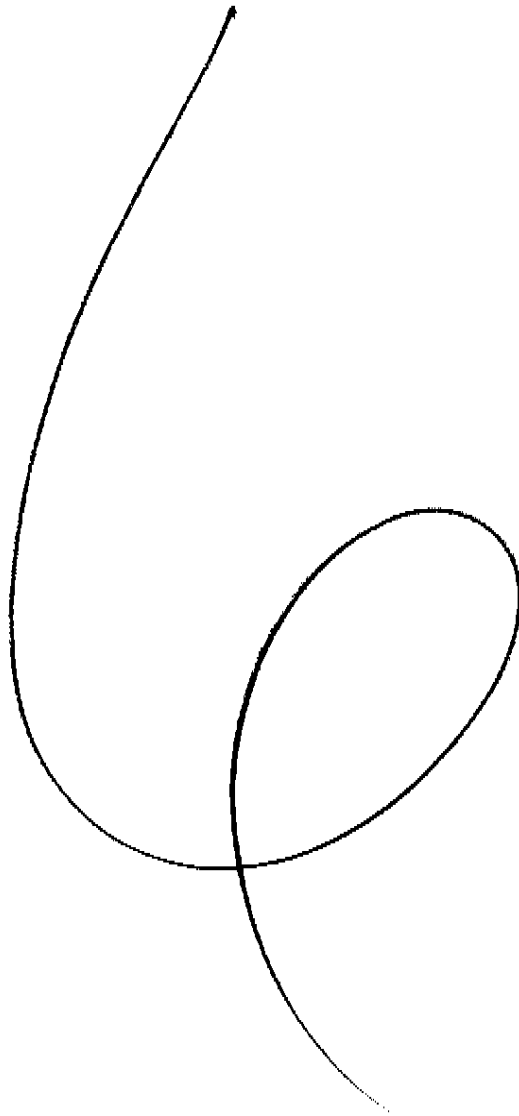
| | | | |
|--|--------------------|---|----------------------------|
| Contributors Last Name or Organization Mark Schauer for State Senate | First Name | Occupation Employer/Business Address | Employer |
| Contributors Address 1795 Hamilton | | City | State MI |
| City Battle Creek | State MI | Zip Code | Amount 15,000.00 |
| Zip Code 49017 | | | |

Contribution # 3

| | | | |
|---|--------------------|---|--------------------|
| Contributors Last Name or Organization Committee To Elect Michael Switalski | First Name | Occupation Employer/Business Address | Employer |
| Contributors Address 31412 Gay | | City | State MI |
| City Roseville | State MI | Zip Code | Amount |

LATE CONTRIBUTION REPORT

| | |
|--------------------------|-----------|
| Zip Code 48066 | 30,000.00 |
|--------------------------|-----------|





MICHIGAN DEPARTMENT OF STATE
Bureau of Elections

267501

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 265 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>03/21/2006</u> Name: <u>The American Electric Power Company</u> <u>110 W. Michigan Ave. Suite 1000A</u> Address: <u>Lansing MI 48933</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 1500.00 | 1500.00 |
| 3. Contribution # 266 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>03/13/2006</u> Name: <u>Operating Engineers' Local 324</u> <u>37450 Schoolcraft Suite 110</u> Address: <u>Livonia MI 48150</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 5000.00 | 5000.00 |
| 3. Contribution # 267 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>03/15/2006</u> Name: <u>Committee to Elect Samuel Buzz Thomas</u> <u>PO Box 14854</u> Address: <u>Detroit MI 48214</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 500.00 | 500.00 |
| 3. Contribution # 268 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>03/10/2006</u> Name: <u>BROOKE HOLDINGS INC AND JACKSON NATIONAL</u> <u>1 CORPORATE WAY</u> Address: <u>LANSING MI 48951</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 1000.00 | 1500.00 |

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8000.00

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277713

**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 1037 Is this contribution from a PAC? <input type="checkbox"/> YES Name: THERESA M HOFFMAN 8850 BELLEVUE Address: GROSSE ILE MI 48138 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 25.00 | 25.00 |
| 3. Contribution # 1038 Is this contribution from a PAC? <input type="checkbox"/> YES Name: KAREN HANSEN 873 CLIFFS DR Address: YPSILANTI MI 48198 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 5.00 | 5.00 |
| 3. Contribution # 1039 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES Name: Committee To Elect Samuel Buzz Thomas PO Box 14854 Address: Detroit MI 48214 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 15000.00 | 15000.00 |
| 3. Contribution # 1040 Is this contribution from a PAC? <input type="checkbox"/> YES Name: MICHAEL MCCARTY 1466 ALCONA DR Address: BURTON MI 48509 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 20.00 | 20.00 |

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15050.00

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**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # 1109 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>09/12/2006</u> Name: <u>Friends of Jim Barcia</u> <u>PO Box 775</u> Address: <u>Bay City MI 48707</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 10000.00 | 14000.00 |
| 3. Contribution # 1110 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>09/07/2006</u> Name: <u>Michigan Restaurant Association</u> <u>225 West Washtenaw</u> Address: <u>Lansing MI 48933</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 1000.00 | 2000.00 |
| 3. Contribution # 1111 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>09/18/2006</u> Name: <u>Tupac A. Hunter for State Senate</u> <u>24461 Pembroke Ave</u> Address: <u>Detroit MI 48219</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 1000.00 | 1000.00 |
| 3. Contribution # 1112 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>09/19/2006</u> Name: <u>Committee To Elect Samuel Buzz Thomas</u> <u>PO Box 14854</u> Address: <u>Detroit MI 48214</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 5000.00 | 20000.00 |

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17000.00

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**ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE**

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|---|-----------|--|
| 3. Contribution # 1333 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/06/2006</u> Name: <u>Mark Slavens for Senate</u> <u>PO Box 87906</u> Address: <u>Canton MI 48187</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 20000.00 | 40000.00 |
| 3. Contribution # 1334 Is this contribution from a PAC? <input type="checkbox"/> YES 4. Date of Receipt <u>09/28/2006</u> Name: <u>C PATRICK C BABCOCK</u> <u>2237 POST OAK LN</u> Address: <u>LANSING MI 48912</u> 5. If over \$100.00 cumulative, please provide: Occupation <u>CONSULTANT</u> Employer <u>W K KELLOGG FOUNDATION</u> Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input checked="" type="checkbox"/> Fund Raiser | 500.00 | 500.00 |
| 3. Contribution # 1335 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>09/29/2006</u> Name: <u>KELLOGG BETTER GOVERNMENT COMMITTEE MI</u> <u>PO BOX 3599</u> Address: <u>ONE KELLOGG SQUARE</u> <u>BATTLE CREEK MI 49016-3599</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 1000.00 | 3000.00 |
| 3. Contribution # 1336 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/01/2006</u> Name: <u>Committee To Elect Samuel Buzz Thomas</u> <u>PO Box 14854</u> Address: <u>Detroit MI 48214</u> 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 2500.00 | 22500.00 |

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24000.00

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ITEMIZED CONTRIBUTIONS
SCHEDULE 2A
INDEPENDENT OR POLITICAL COMMITTEE

1. Committee I.D. Number 503510-0
2. Committee Name SENATE DEMOCRATIC FUND

| Please enter contributor's name and address. If contribution is from an individual, enter last name, first name, middle initial. Check box to indicate if contribution is from a Political Committee or an Independent Committee (Both are commonly called PACs). | 6. Amount | 7. Cumulative for Calendar Year for Each Contributor (Through date of receipt) |
|--|-----------|--|
| 3. Contribution # 765 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/11/2006</u> Name: Committee To Elect Michael Switalski 31412 Gay Address: Roseville MI 48066 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 30000.00 | 40000.00 |
| 3. Contribution # 766 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/10/2006</u> Name: Friends of Jim Bardia PO Box 775 Address: Bay City MI 48707 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 5000.00 | 19000.00 |
| 3. Contribution # 767 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/11/2006</u> Name: Committee To Elect Samuel Buzz Thomas PO Box 14854 Address: Detroit MI 48214 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 15000.00 | 37500.00 |
| 3. Contribution # 768 Is this contribution from a PAC? <input checked="" type="checkbox"/> YES 4. Date of Receipt <u>10/11/2006</u> Name: Friends of Liz Brater PO Box 7955 Address: Ann Arbor MI 48107 5. If over \$100.00 cumulative, please provide: Occupation _____ Employer _____ Business Address _____ Type of Contribution: <input checked="" type="checkbox"/> Direct <input type="checkbox"/> Loan from a person <input type="checkbox"/> Fund Raiser | 20000.00 | 30000.00 |

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